

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Reassessment of Federal Communications	)	ET Docket No. 13-84
Commission Radiofrequency Exposure Limits and	)	
Policies	)	
	)	
Proposed Changes in the Commission's Rules	)	ET Docket No. 03-137
Regarding Human Exposure to Radiofrequency	)	
Electromagnetic Fields	)	
	)	

To: Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Comment Filed by: Holly Manion  
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August 30, 2013

AFFIDAVIT OF HOLLY MANION

State of California   ]

San Diego County   ]

I, Holly Manion, attest that my statements are true to the best of my knowledge.

Comment round for FCC ET Docket No. 013-84 and ET Docket No. 03-137

1.) My name is Holly Manion. My address is 17090 El Mirador, Rancho Santa Fe, CA 92067.

2) I am a residential real estate broker in Rancho Santa Fe, California. I also maintain an EMF information website, [www.emfhealthalert.com](http://www.emfhealthalert.com).

3) On June 16, 2011 a man hired by San Diego Gas and Electric (SDGE) installed what he called was "an upgrade" to my Mother's utility meter. Following the installation of this utility meter upgrade, my Mother complained of a constant high pitched ringing in her ears, and she did not feel well. She felt lethargic; she complained about her vision; and she had a hard time with her speech and focus. Her legs, especially her feet became swollen. Within a week she fell for no apparent reason.

My brother, sisters and I take care of my Mother. These were very unusual symptoms for her. We could not figure out what was causing her declining health until she mentioned the man who had come by to upgrade her meter. I brought over my RF testing equipment and found that the RF bursts from the meters were every few minutes and extremely high. Readings were far in excess of what is allowable for total ambient surroundings of  $1000 \mu\text{W}/\text{cm}^2$ . So we immediately removed the meter! Within a few days of the meter being removed, Mother's symptoms decreased, and she returned to her normal health.

A concerned neighbor and medical writer familiar with microwave radiation, Susan

Foster, wrote SDGE a letter on my Mother's behalf discussing her symptoms and comparing the intensity of radiation of the smart meter on Mother's house to the radiation of the cell towers on fire stations, and what the radiation did to the health of the firefighters. Susan Foster referenced a letter from Dr. Olle Johansson, Karolinska Institute, Stockholm Sweden to the California Public Utilities Commission. [See letters attached: Susan Foster, Dr. Olle Johansson](#)

4) In May of 2011 the World Health Organization- International Agency for Research on Cancer (IARC) classified radiofrequency radiation as a class 2B possible carcinogen. This is the same category as DDT, lead based paint, car exhaust and chloroform. The FCC must address and incorporate the appropriate measures to take into account the IARC's 2B classification before subjecting the masses to preventable and harmful non ionizing microwave exposure.

5) 2012 BioInitiative Report classifies radiofrequency radiation as a carcinogen. <http://www.bioinitiative.org> This is one of the most comprehensive reports prepared by 29 independent scientists and medical experts from around the world. It included 1800 new studies reporting abnormal gene transcription, geno-toxicity and single and double-strand DNA damaging, stress proteins because of the fractal RF antenna like nature of DNA, chromatin condensation and loss of DNA repair capacity in human stem cells, reduction in free radical scavengers-particularly melatonin, neurotoxicity in humans and animals, carcinogenicity in humans, serious impacts on human and animal sperm morphology and function, effects on offspring behavior, effects on brain and cranial bone development in the offspring of animals that are exposed to cell phone radiation during pregnancy.

6) "Public safety standards are 1,000 – 10,000 or more times higher than levels now commonly reported in mobile phone base station studies to cause bio effects. "(<http://www.bioinitiative.org/conclusions/>) At least five new cell tower studies are reporting bioeffects in the range of 0.003 to 0.05  $\mu\text{W}/\text{cm}^2$  at lower levels than reported in 2007 (0.05 to 0.1  $\mu\text{W}/\text{cm}^2$  was the range below which, in 2007,

effects were not observed). Researchers report headaches, concentration difficulties and behavioral problems in children and adolescents; and sleep disturbances, headaches and concentration problems in adults.

7) The FCC has a duty to protect the public health and safety from harm from radiofrequency radiation. My home is located high on a hill a few hundred feet from a telecommunication cell site which was installed in 2007. Over the last few years my health has changed. I feel increasing pressure in my head, ringing in my ears; I have high blood pressure, occasional heart palpitations, decreasing vision, and sleeping problems. At times I cannot enjoy my yard and pool area as the pressure in my head is unbearable. I have friends who have complained about the RFR in my yard as well. Meanwhile, I have spent thousands of dollars, and lots of time turning my bedroom into a faraday cage so I can give my body time to recover from constant exposure of RF microwaves from the cell sites, smart meters, WiFi and other wireless communicating systems surrounding. My bedroom has been painted with a special EMF blocking paint, and is surrounded by copper mesh. Copper mesh covers all windows as well. In all parts of my home I use a wired phone: my Internet is attached with an Ethernet cable; I do not use a microwave; I do not have a smart meter, and I rarely use a cell phone. It is in the off position most of the time. Yet the intensity of RF radiation in my home and property is increasing. This radiation is all involuntary exposure, and is affecting my health and the enjoyment of my property.

8) Existing FCC public safety limits are inadequate to protect public health. New biologically based maximal exposure guidelines and limits are needed which take into account long term, non thermal effects, and include vulnerable groups such as, children, fetuses, the elderly, the ill, disabled, genetically challenged, and the electro-hypersensitive. These limits should take into account the effects of cumulative

exposure of radiating devices operating simultaneously, including but not limited to involuntary exposure from smart meters, cell towers and WiFi, along with voluntary personal devices such as cell phones, computers, and Ipads. The masses are being exposed to a blanket of RF radiation emitted by the many wireless systems and devices which create an electro smog we cannot not see, feel or touch, but indeed affects our bodies at the cellular level.

9) Expansion of broadband wireless systems is exposing entire communities to continuous and involuntary source of microwave radiation. The RF signal goes throughout homes that do not want to subscribe. Individuals and families cannot “opt out” of blanket wireless broadband exposure.

10) The FCC is in violation of the Americans with Disabilities Act (ADA) by failing to modernize its RF safety limits, and promoting blanket wireless radiation coverage.

The microwave radiation from wireless technology causes serious functional impairment to many whose symptoms have been characterized under the name radiofrequency sickness. The symptoms can range from discomfort to life-threatening depending on the exposure and the individual involved. [Please see [“Provocation Study using Heart Rate Variability Shows Radiation from 2.4 GHz Cordless Phone Affects Autonomic Nervous System”](#) (Eur. J. Oncol. Library, vol. 5) at [http://electromagnetichealth.org/wp-content/uploads/2010/10/Havas\\_HRV\\_Ramazzini1.pdf](http://electromagnetichealth.org/wp-content/uploads/2010/10/Havas_HRV_Ramazzini1.pdf) The near universal presence of radiation from wireless devices that does not fall below biologically meaningful safety limits is seriously limiting the ability of a growing segment of the American population to participate in civil society and community life.

11) US citizens and tax payers deserve updated radiofrequency radiation safety limits based on biology, not physics. In order for the FCC to fulfill its Congressional mandate to protect the public health and safety from harm from radiofrequency radiation, it must update its RF safety regulations.

"In the Telecom Act of 1996 Congress directed the FCC to set its own RF safety

regulations for emissions from Personal Wireless Services Facilities (PWSF). The House Committee on Commerce said it was the Commission's responsibility to adopt uniform RF regulations "with adequate safeguards of the public health and safety." (H.R. Report No. 104-204, p. 94)

12) FCC does not possess the expertise to set biologically- based radiofrequency radiation safety limits. EPA does. Therefore, the FCC should advocate that Congress direct the EPA to establish biologically- based radiofrequency radiation safety limits and provide the budget and resources to carry out that task. 2012 HR6358 was an excellent example of legislation to authorize the EPA to establish biologically-based radiofrequency radiation safety limits.

13) Compliance with FCC radiofrequency radiation limits is often cited as an excuse to ignore evidence of harm by transmitting utility meters, cell sites, 4G networks, etc. and force harmful exposure on people against their will. Therefore the FCC is causing substantial harm to citizens by not updating RF exposure limits to biologically- based safety limits.

14) RF radiation from wireless infrastructures is affecting more than just people, it is affecting animals, birds, bees, butterflies and plants. The lack of appropriate biologically-based RF safety limits is damaging the environment. This document was commissioned by the government of India

[http://www.moef.nic.in/downloads/public-information/final\\_mobile\\_towers\\_report.pdf](http://www.moef.nic.in/downloads/public-information/final_mobile_towers_report.pdf)

and this one is a review of the literature

[http://www.biolmedonline.com/Articles/Vol4\\_4\\_2012/Vol4\\_4\\_202-216\\_BM-8.pdf](http://www.biolmedonline.com/Articles/Vol4_4_2012/Vol4_4_202-216_BM-8.pdf) "

Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review," Biology and Medicine

15) A moratorium should be placed on sales of new spectrum, transmitting utility meter installation, and installation of additional base stations for wireless service

while biologically-based safety limits are being developed.

16) The FCC has a duty under Scenic Hudson to create a complete record and to consider seriously my Comments in order to fulfill its obligation to represent the public interest.

Respectfully submitted by  
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August 30, 2013

A handwritten signature in cursive script that reads "Holly Manion". The signature is written in dark ink and is positioned below the typed name and address.